

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.:

Activity No.: PER20070001
Agency Interest No.: 18667

Mr. Marvin Villard
Plant Manager
Rohm and Haas Chemicals, LLC
11911 Advanced Materials Rd
New Iberia, LA 70562-0500

RE: Permit, CVD Inc - Advanced Materials, Rohm & Haas Chemicals LLC
New Iberia, Iberia Parish, Louisiana

Dear Mr. Villard:

This is to inform you that the permit request for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Also enclosed is a document entitled "General Information." Please be advised that this document contains a summary of facility-level information contained in LDEQ's TEMPO database and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

The permit number cited below and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this ____ day of _____, 2008.

Permit No.: 1260-00023-08

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN:AHG

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CVD Inc - Advanced Materials
Agency Interest No.: 18667
Rohm & Haas Chemicals, LLC
New Iberia, Iberia Parish, Louisiana

I. BACKGROUND

Rohm & Haas Chemicals LLC, CVD Inc - Advanced Materials is an existing optical materials production facility. The facility, initially owned and operated by Morton Thiokol, Inc., CVD Incorporated, was constructed and began operation in the late nineteen eighties. Its initial state Permit No. 1260-00023-00 was issued on May 29, 1989 for an advanced optics production facility. A modification request to construct and operate process equipment to produce hydrogen selenide (H₂Se) gas, which is a feed stock material, was approved and Permit 1260-00023-01 was issued on March 10, 1990. At that time the facility name was Advanced Materials Weeks Island Facility and was operated by CVD, Inc., which is a wholly owned subsidiary of Morton International, Inc. The latter is itself a wholly owned subsidiary of Rohm & Haas Company. Additional requests for minor modifications were approved and the corresponding permits were issued on January 2, 1992, March 24, 1994, October 22, 1997, January 30, 2002 and June 25, 2004. Effective January 1, 2005, as a result of an internal restructuring, CVD, Inc. became a wholly owned subsidiary of a newly formed company, Rohm & Haas Chemicals, LLC, which like Morton International Inc. is a wholly owned subsidiary of Rohm & Haas Company. A modification request consisting of the addition of two new primary zinc furnaces with separate primary scrubbers, Emission Points 35-A and EP 35-B, whose outlets are routed to the common secondary zinc furnace scrubber, Emission Point 35, was approved and Permit No. 1260-00023-07 was issued on April 07, 2005. A request to change the efficiency of EQT 9, Emission Point 17, Process Emission Control Scrubber Silicon Carbide, from 92% to 95% and incorporate other minor changes was approved. Amended Permit No. 1260-00023-07 was re-issued September 08, 2005, under which CVD Inc - Advanced Materials is currently operating.

II. ORIGIN

A permit application and Emission Inventory Questionnaire (EIQ) dated April 23, 2007 were received requesting a permit. Additional information dated June 13, 2007 was also received. A revised complete submittal dated April 9, 2008. Additional information dated May 27, 2008, June 18 and June 20, 2008 were also received.

III. DESCRIPTION

The Rohm & Haas Advanced Materials Facility produces advanced optical materials that have properties uniquely suitable at infrared wavelengths. Specialized windows, lenses and other optical elements are created and utilized in a variety of air and ground military applications. Raw materials used at the facility include hydrogen selenide, hydrogen sulfide, hydrogen, argon, nitrogen, methyltrichlorosilane (MTS), carbon dioxide, selenium, helium, and zinc. The facility has four chemical vapor deposition (CVD) vacuum furnaces dedicated to the production of optical materials consisting of zinc selenide, or zinc sulfide, and two

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furnaces for silicon carbide. The chemical vapor deposition (CVD) process consists of the reaction of gaseous chemicals in a furnace to form a crystalline solid. These solids then fall into various shaped graphite mandrels that have been placed at the base of the furnace. Once removed from the furnace, the materials undergo cutting, grinding, or polishing within the optical fabrication area prior to sale. The spray booths are used to create the graphite coating on the mandrels.

Zinc is introduced into the center of the furnace where the temperature ensures that it is in a gaseous form. Either hydrogen selenide or hydrogen sulfide is injected into the furnace to allow for the zinc to react and form either zinc selenide or zinc sulfide. This reaction occurs within an inert argon atmosphere in the furnace. Hydrogen selenide is produced on site by melting selenium pellets and bubbling hydrogen through the liquid to produce the hydrogen selenide gas, which is collected and liquefied for storage until used.

The silicon carbide production unit process consists of the injection of methyltrichlorosilane (MTS) into a high vacuum furnace. In the presence of argon and hydrogen, the MTS reacts to form silicon carbide. Hydrogen chloride is a by-product of this process.

Emission points on site also include two emergency generators, with two associated diesel storage tanks, two fire water pumps with associated diesel storage tanks, two spray booths, a grinder dust collector, and acetone cleaning and polishing emissions. Four small tanks, three storing caustic and the fourth storing vacuum oil, are listed as Insignificant Activities.

Rohm and Haas Chemicals, LLC proposes to effect the following changes:

1. Incorporate the final design stack parameters of EQT 009, Emission Point 17: Process Emission Control Scrubber Silicon Carbide.
2. Permit two existing diesel fired generators, Emission Points 24 and 31, currently reported as insignificant activities.
3. Re-permit the additional zinc furnace, Emission Point 35B, previously permitted but not timely constructed.
4. Install a Fabrication Vacuum System.
5. Remove out of service the skid mounted cooling tower, Emission Point 32.
6. Cap the operating hours for the above generators to 2430 hours per year (to ensure that the facility remains a minor source).
7. Update the emissions from and the stack parameters of EQT 010, Emission Point 30: New Process Emission Control Scrubber Silicon Carbide, based on a final design.
8. Decrease the frequency of change-outs of the scrubbing solution in the gas plant reactor scrubbers, Emission Points 8 and 9, from once every 40-48 hours to once every 120-130 hours.
9. Update the information of the facility's personnel list.

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Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	1.32	9.60	+ 8.28
SO ₂	-	6.27	+ 6.27
NO _x	-	94.84	+ 94.84
CO	-	20.44	+ 20.44
VOC	9.06	10.25	+ 1.19

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions -TPY		
	Before	After	Change
Hydrogen Chloride, Anhydrous *	7.23	0.08	- 7.15
Hydrogen Selenide *	1.51	0.61	- 0.90
Hydrogen Sulfide *	0.022	0.22	+ 0.198
Xylene	0.47	0.47	-
Zinc	NA	0.003	+ 0.003
Total TAP's	9.232	1.383	- 7.849
Other VOC's	8.59	9.777	+ 1.187
Total VOC	9.06	10.25	+ 1.19

*Non Volatile Organic Compound Toxic Air Pollutant.

IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

This facility is a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs). There are no facilities under common ownership and contiguous with the Rohm and Haas Advanced Materials Facility.

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The facility does not manufacture flat glass, glass containers, or pressed and blown glass by melting a mixture of raw materials, as defined in 40 CFR 63.11459. Hence the facility it does not meet the applicability criteria specified in 40 CFR 63.11448 and thus it is not subject to the requirements of 40 CFR 63 – Subpart SSSSSS “National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources” promulgated December 26, 2007:

V. PUBLIC NOTICE

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, the *Times Picayune*, New Orleans and in *St. Bernard Voice* on XXXX XX, 2008 and again on XXXX XX, 2008. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on XXXX XX, 2008. Comments will be addressed and resolved prior to issuance of the final permit.

VI. EFFECTS ON AMBIENT AIR

Dispersion Model Used: NONE

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Ambient Air Quality Standard (NAAQS)
NONE			

VII. GENERAL CONDITION XVII ACTIVITIES

Work Activity	Schedule	Emission Rates - tons				
		PM ₁₀	SO ₂	NO _x	CO	VOC
NONE						

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VIII. INSIGNIFICANT ACTIVITIES

ID No.	Description	Citation
AM-19	Diesel Storage Tank (8,273 gals)	LAC 33:III.501.B.5.A.3
AM-25	Diesel Storage Tank (8,273 gals)	LAC 33:III.501.B.5.A.3
AM-27	Diesel Storage Tank (734 gals)	LAC 33:III.501.B.5.A.3
AM-29	Diesel Storage Tank (734 gals)	LAC 33:III.501.B.5.A.3
AM-Vacuum Oil	Oil Storage Tank (1,500 gals)	LAC 33:III.501.B.5.A.3
AM-Fresh KOH	Fresh KOH Storage Tank	LAC 33:III.501.B.5.A.4
AM-NaOH	NaOH Storage Tank	LAC 33:III.501.B.5.A.4
AM-Spent KOH	Spent KOH Storage Tank	LAC 33:III.501.B.5.A.4
AM-26	Firewater Pump No. 1*	LAC 33:III.501.B.5.D
AM-28	Firewater Pump No. 2*	LAC 33:III.501.B.5.D

*These items currently qualify as insignificant activities. Any replacement of these items by new engines that are affected sources under either NSPS IIII or JJJJ will require a permit modification and the removal of the sources from the insignificant activities list.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated April 23, 2007, along with supplemental information dated June 13, 2007. A revised complete submittal dated April 9, 2008 and additional information dated May 27, 2008, June 18 and June 20, 2008 were also received.
- IV. This permit shall become invalid, for the sources not constructed, if:
- A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.
- The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.
- This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 - 1. Report by June 30 to cover January through March
 - 2. Report by September 30 to cover April through June
 - 3. Report by December 31 to cover July through September
 - 4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 18667 CVD Inc - Advanced Materials

Activity Number: PER20070001

Permit Number: 1260-00023-08

Air - Minor (Synthetic) Initial

Also Known As:	ID	Name	User Group	Start Date
	1260-00023	Rohm & Haas Chemicals LLC - Advanced Materials	CDS Number	10-25-1994
	06-1113497	Federal Tax ID	Federal Tax ID	11-21-1999
	LAD982560914	Morton International Advanced Materials	Hazardous Waste Notification	07-24-2000
	LA0098949	WPC File Number	LPDES Permit #	06-25-2003
	LAR05M791	WPC File Number	LPDES Permit #	05-22-2003
	WP2394	WPC State Permit Number	LWDPS Permit #	06-25-2003
	D-045-0369	Rohm & Haas Chemicals LLC - Advanced Materials	Multimedia	01-01-2005
	G-045-10689	CVD Inc - Advanced Materials	Priority 2 Emergency Site	06-01-2006
	17484	Morton Thiokol Inc	Solid Waste	01-08-2002
	2517	Site Id Number	Solid Waste Facility No.	11-21-1999
	28073	Morton Thiokol Inc Cvd Inc	TEMPO Merge	03-04-2001
	38308	Morton International Inc	TEMPO Merge	03-04-2001
	5582	Morton Thiokol	TEMPO Merge	03-04-2001
	9803	Morton International Inc	TEMPO Merge	03-04-2001
		Morton International CVC	TEMPO Merge	03-04-2001

Physical Location: 11911 Advanced Materials Rd in Weeks island
18 Mi S of W of Hwy 83
New Iberia, LA 70560

Mailing Address: PO Box 500
New Iberia, LA 705620500

Location of Front Gate: 29° 48' 7" latitude, 91° 48' 37" longitude, Coordinate Method: Interpolation - Map, Coordinate Datum: NAD27

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Karen Jenkins	PO Box 500 New Iberia, LA 705620500	3378674263 (WP)	Water Permit Contact For
	Karen Jenkins	PO Box 500 New Iberia, LA 705620500	3378674263 (WP)	Air Permit Contact For
	Karen Jenkins	PO Box 500 New Iberia, LA 705620500	3378674263 (WP)	Accident Prevention Contact for
	Karen Jenkins	PO Box 500 New Iberia, LA 705620500	3378674263 (WP)	Haz. Waste Billing Party for
	Lisa Renner	PO Box 500 New Iberia, LA 705620500	3378674263 (WP)	Accident Prevention Billing Party for
	Lisa Renner	PO Box 500 New Iberia, LA 705620500	3378674263 (WP)	Radiation Registration Billing Party for
	Marvin Villard	PO Box 500 New Iberia, LA 705620500	3378674263 (WP)	Water Billing Party for
		11911 Advanced Materials Rd New Iberia, LA 70562	3378674263 (WP)	Responsible Official for

Related Organizations: Name Address Phone (Type) Relationship

General Information

AI ID: 18667 CVD Inc - Advanced Materials

Activity Number: PER20070001

Permit Number: 1260-00023-08

Air - Minor (Synthetic) Initial

Related Organizations:	Name	Address	Phone (Type)	Relationship
	CVD Inc - Advanced Materials	PO Box 500 New Iberia, LA 7056620500		Owns
	Rohm & Haas Chemicals LLC	PO Box 500 New Iberia, LA 7056620500		Operates
	Rohm & Haas Chemicals LLC	PO Box 500 New Iberia, LA 7056620500		Air Billing Party for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

AJ ID: 18667 - CVD Inc - Advanced Materials
Activity Number: PER20070001
Permit Number: 1260-00023-08
Air - Minor (Synthetic) Initial

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Weeks Island Advanced Materials						
EQT0002	01 - Process Emission Control Scrubber (Zinc Products)		1280 ft ³ /min (actual)	640 ft ³ /min (actual)		8,760 hr/yr (All Year)
EQT0003	02 - Spray Booth No. 1		2 gallons/hr			8,760 hr/yr (All Year)
EQT0004	03 - Spray Booth No. 2		2 gallons/hr			8,760 hr/yr (All Year)
EQT0005	06 - Grinder Dust Collector		11000 ft ³ /min (actual)	5500 ft ³ /min (actual)		8,760 hr/yr (All Year)
EQT0006	07 - Gas House Scrubber		6300 ft ³ /min (actual)	3150 ft ³ /min (actual)		8,760 hr/yr (All Year)
EQT0007	08 - East Reactor Emission Control Scrubber		920 ft ³ /min (actual)	460 ft ³ /min (actual)		8,760 hr/yr (All Year)
EQT0008	09 - West Reactor Emission Control Scrubber		920 ft ³ /min (actual)	460 ft ³ /min (actual)		8,760 hr/yr (All Year)
EQT0009	17 - Process Emission Control Scrubber A (Silicon Carbide)		400 ft ³ /min (actual)	200 ft ³ /min (actual)		8,760 hr/yr (All Year)
EQT0010	30 - New Process Emission Control Scrubber B (Silicon Carbide)		400 ft ³ /min (actual)	200 ft ³ /min (actual)		8,760 hr/yr (All Year)
EQT0012	34 - Gas Plant Room Air Scrubber		11000 ft ³ /min	5500 ft ³ /min		8,760 hr/yr (All Year)
EQT0013	01-A - CVD Primary Scrubber No. 3					8,760 hr/yr (All Year)
EQT0014	01-B - CVD Primary Scrubber No. 4					8,760 hr/yr (All Year)
EQT0015	01-C - CVD Primary Scrubber No. 5					8,760 hr/yr (All Year)
EQT0016	35-A - CVD Primary Scrubber No. 7					8,760 hr/yr (All Year)
EQT0017	35-B - CVD Primary Scrubber No. 8					8,760 hr/yr (All Year)
EQT0018	35 - Process Emission Control Scrubber B (Zinc Products)		1280 ft ³ /min	640 ft ³ /min		8,760 hr/yr (All Year)
EQT0019	31 - Generator No. 2		2518 horsepower	2518 horsepower	Diesel fired engine	2430 hr/yr (All Year)
EQT0020	24 - Generator No. 1		2518 horsepower	2518 horsepower	Diesel fired engine	2430 hr/yr (All Year)
EQT0022	37 - Fabrication Vacuum System		1400 ft ³ /min (actual)	700 ft ³ /min (actual)		8,760 hr/yr (All Year)
FUG0002	14 - Xylene Fugitive Emissions		130 gallons/yr	130 gallons/yr		8,400 hr/yr (All Year)

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Weeks Island Advanced Materials							
EQT0002	01 - Process Emission Control Scrubber (Zinc Products)	40.37	640	.58		52	120
EQT0003	02 - Spray Booth No. 1	21.38	6000	2		21	90
EQT0004	03 - Spray Booth No. 2	28.29	3000	1.5		37	90
EQT0005	06 - Grinder Dust Collector	466.85	5500	.5		10	90
EQT0006	07 - Gas House Scrubber	267.38	3150	.5		38	90
EQT0007	08 - East Reactor Emission Control Scrubber	21.75	460	.67		26	90
EQT0008	09 - West Reactor Emission Control Scrubber	21.75	460	.67		26	90
EQT0009	17 - Process Emission Control Scrubber A (Silicon Carbide)	9.45	200	.67		20	110
EQT0010	30 - New Process Emission Control Scrubber B (Silicon Carbide)	9.45	200	.67		20	110
EQT0012	34 - Gas Plant Room Air Scrubber	9.53	5500	3.5		13	90
EQT0018	35 - Process Emission Control Scrubber B (Zinc Products)	52.22	640	.51		52	120
EQT0019	31 - Generator No. 2	213.43	6929	.83		11	90

INVENTORIES

AI ID: 18667 - CVD Inc - Advanced Materials
 Activity Number: PER20070001
 Permit Number: 1260-00023-08
 Air - Minor (Synthetic) Initial

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Weeks Island Advanced Materials							
EQT0020	24 - Generator No. 1	228.76	10780	1		16.08	150
EQT0022	37 - Fabrication Vacuum System	59.42	700	.5		10	90

Relationships:

ID	Description	Relationship	ID	Description
EQT0013	01-A CVD Primary Scrubber No. 3	Vents to	EQT0002	01 Process Emission Control Scrubber (Zinc Products)
EQT0014	01-B CVD Primary Scrubber No. 4	Vents to	EQT0002	01 Process Emission Control Scrubber (Zinc Products)
EQT0015	01-C CVD Primary Scrubber No. 5	Vents to	EQT0002	01 Process Emission Control Scrubber (Zinc Products)
EQT0016	35-A CVD Primary Scrubber No. 7	Vents to	EQT0018	35 Process Emission Control Scrubber B (Zinc Products)
EQT0017	35-B CVD Primary Scrubber No. 8	Vents to	EQT0018	35 Process Emission Control Scrubber B (Zinc Products)

Subject Item Groups:

ID	Group Type	Group Description
CRG0001	Common Requirements Group	PS3-8 - CVD Primary Scrubbers Nos. 3 through 8
CRG0002	Common Requirements Group	ZS1&3 - Process Emission Control Scrubber (Zinc Products)
CRG0003	Common Requirements Group	EWRC5 - East & West Reactor Emission Control Scrubbers
CRG0004	Common Requirements Group	PECS - Process Emission Control Scrubber Silicone Carbide
CRG0005	Common Requirements Group	GE - Diesel Generators
GRP0001	Equipment Group	33 - Spray Booth Emission Cap
GRP0003	Equipment Group	36 - Generators Emissions CAP
UNF0001	Unit or Facility Wide	CVD - Weeks Island Advanced Materials

Group Membership:

ID	Description	Member of Groups
EQT0002	01 - Process Emission Control Scrubber (Zinc Products)	CRG000000000002
EQT0003	02 - Spray Booth No. 1	GRP000000000001
EQT0004	03 - Spray Booth No. 2	GRP000000000001
EQT0007	08 - East Reactor Emission Control Scrubber	CRG000000000003
EQT0008	09 - West Reactor Emission Control Scrubber	CRG000000000003
EQT0009	17 - Process Emission Control Scrubber A (Silicon Carbide)	CRG000000000004
EQT0010	30 - New Process Emission Control Scrubber B (Silicon Carbide)	CRG000000000004
EQT0013	01-A - CVD Primary Scrubber No. 3	CRG000000000001
EQT0014	01-B - CVD Primary Scrubber No. 4	CRG000000000001
EQT0015	01-C - CVD Primary Scrubber No. 5	CRG000000000001
EQT0016	35-A - CVD Primary Scrubber No. 7	CRG000000000001
EQT0017	35-B - CVD Primary Scrubber No. 8	CRG000000000001
EQT0018	35 - Process Emission Control Scrubber B (Zinc Products)	CRG000000000002
EQT0019	31 - Generator No. 2	CRG000000000005, GRP000000000003

INVENTORIES

AI ID: 18667 - CVD Inc - Advanced Materials
 Activity Number: PER20070001
 Permit Number: 1260-00023-08
 Air - Minor (Synthetic) Initial

Group Membership:

ID	Description	Member of Groups
EQT0020	24 - Generator No. 1	CRG0000000005, GRP0000000003

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0780	Glass and Glass Container Mfg. Natural Gas Fuel		Lines

SIC Codes:

1476	Rock Salt-Mng	A118667
2899	Chemical preparations, nec	A118667
3827	Optical instruments and lenses	A118667
3827	Optical instruments and lenses	UNF001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 18667 - CVD Inc - Advanced Materials

Activity Number: PER20070001

Permit Number: 1260-00023-08

Air - Minor (Synthetic) Initial

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Weeks Island Advanced Materials															
EQT 0003 02								0.013						12.01	
EQT 0004 03								0.013						12.01	
EQT 0005 06							0.08	0.17	0.37						
EQT 0009 17													0.01	0.01	0.03
EQT 0010 30													0.01	0.01	0.03
EQT 0019 31		20.18			93.67			6.65			6.19			7.60	
EQT 0020 24		20.18			93.67			6.65			6.19			7.60	
EQT 0022 37							0.57	1.14	2.50						
FUG 0002 14													0.11	1.80	0.47
GRP 0001 33							0.001		0.002				0.46		2.03
GRP 0003 36	16.82		20.44	78.06		94.84	5.54		6.73	5.16	6.27	6.33			7.69

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 18667 - CVD Inc - Advanced Materials

Activity Number: PER20070001

Permit Number: 1260-00023-08

Air - Minor (Synthetic) Initial

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0002 01	Hydrogen sulfide	0.007	0.014	0.030
	Selenium (and compounds)	0.009	0.018	0.040
EQT 0005 06	Total suspended particulate		0.551	
EQT 0006 07	Hydrogen sulfide	0.037	0.074	0.160
	Selenium (and compounds)	0.039	0.078	0.170
EQT 0007 08	Selenium (and compounds)	0.007	0.014	0.030
EQT 0008 09	Selenium (and compounds)	0.007	0.014	0.030
EQT 0009 17	Hydrochloric acid	0.010	0.020	0.042
EQT 0010 30	Hydrochloric acid	0.010	0.020	0.042
EQT 0012 34	Selenium (and compounds)	0.068	0.136	0.300
EQT 0018 35	Hydrogen sulfide	0.007	0.014	0.030
	Selenium (and compounds)	0.009	0.018	0.040
EQT 0022 37	Zinc (and compounds)	0.001	0.001	0.003
FUG 0002 14	Xylene (mixed isomers)	0.11	1.80	0.47
UNF 0001 CVD	Hydrochloric acid			0.08
	Hydrogen sulfide			0.22
	Selenium (and compounds)			0.61
	Xylene (mixed isomers)			0.47
	Zinc (and compounds)			0.003

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

Emission Rates Notes:

EQT 0002	Selenium (and compounds)	Avg lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0002	Selenium (and compounds)	Max lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0002	Selenium (and compounds)	Tons/Year	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0006	Selenium (and compounds)	Avg lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0006	Selenium (and compounds)	Max lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0006	Selenium (and compounds)	Tons/Year	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0007	Selenium (and compounds)	Avg lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0007	Selenium (and compounds)	Max lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0007	Selenium (and compounds)	Tons/Year	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0008	Selenium (and compounds)	Avg lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0008	Selenium (and compounds)	Max lb/hr	(emitted as hydrogen selenide)	Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 18667 - CVD Inc - Advanced Materials

Activity Number: PER20070001

Permit Number: 1260-00023-08

Air - Minor (Synthetic) Initial

EQT 0008	Selenium (and compounds)	Tons/Year	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0012	Selenium (and compounds)	Avg lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0012	Selenium (and compounds)	Max lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0012	Selenium (and compounds)	Tons/Year	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0018	Selenium (and compounds)	Avg lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0018	Selenium (and compounds)	Max lb/hr	(emitted as hydrogen selenide)	Which Months: All Year
EQT 0018	Selenium (and compounds)	Tons/Year	(emitted as hydrogen selenide)	Which Months: All Year
UNF 0001	Selenium (and compounds)	Tons/Year	(emitted as hydrogen selenide)	Which Months: All Year

SPECIFIC REQUIREMENTS

AI ID: 18667 - CVD Inc - Advanced Materials
 Activity Number: PER20070001
 Permit Number: 1260-00023-08
 Air - Minor (Synthetic) Initial

CRG0001 PS3-8 CVD Primary Scrubbers Nos. 3 through 8

Group Members: EQT0013 EQT0014 EQT0015 EQT0016 EQT0017

- 1 [LAC 33:III.501.C.6] A greater than 10% KOH solution shall be maintained in the secondary scrubber with a Flow rate \geq 15 gallons/min.
 Which Months: All Year Statistical Basis: None specified
 Flow rate monitored by flow rate monitoring device once every shift during operation.
- 2 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
 Flow rate recordkeeping by electronic or hard copy once every shift during operation. Keep records of the scrubber flow rates on site and available for inspection by the Louisiana Department of Environmental Quality.
- 3 [LAC 33:III.501.C.6] Hydride tape indication. Equipment/operational data recordkeeping by electronic or hard copy once every shift during operation.
 Keep records of the required fluid replacement on site and available for inspection by the Louisiana Department of Environmental Quality.
 Permittee shall control emissions from the zinc-based production furnace by a primary packed column scrubber.
- 4 [LAC 33:III.501.C.6] - Hydrogen selenide / hydrogen sulfide concentration shall be monitored by hydride tapes once per shift during operation to access gas breakthrough in the scrubber fluid. The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly.
- 5 [LAC 33:III.501.C.6] The Hydride tape's lower detection limits (LDL) for hydrogen selenide (20 ppb) and hydrogen sulfide (1.1 ppm) shall be set conservatively at 2% and 50% of the corresponding emissions limits permitted here, and to match the industrial hygiene detection systems.
- 6 [LAC 33:III.501.C.6] - A stained color on the tape indicates that the fluid is saturated and needs to be changed.

- This scrubbing fluid shall be changed the earlier of every 500 hours of furnace operation or when the hydride tape indicates the fluid needs to be changed.

CRG0002 ZS1&3 Process Emission Control Scrubber (Zinc Products)

Group Members: EQT0002 EQT0018

- 7 [LAC 33:III.501.C.6] A greater than 10% KOH solution shall be maintained in the secondary scrubber with a Flow rate \geq 25 gallons/min.
 Which Months: All Year Statistical Basis: None specified
 Flow rate monitored by flow rate monitoring device once every shift during operation.
- 8 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
 Flow rate recordkeeping by electronic or hard copy once every shift during operation.
- 9 [LAC 33:III.501.C.6] Hydride tape indication. Equipment/operational data recordkeeping by electronic or hard copy once every shift during operation.
 Keep records of the required fluid replacement on site and available for inspection by the Louisiana Department of Environmental Quality.
- 10 [LAC 33:III.501.C.6] Keep records of the suppliers certification of percent concentration of purchased KOH, and the procedure used to obtain a scrubbing solution of greater than 10% by weight KOH, on site and available for inspection by the Louisiana Department of Environmental Quality Liquids recordkeeping by the regulation's specified method(s) as needed.
- 11 [LAC 33:III.501.C.6]
- 12 [LAC 33:III.501.C.6]

SPECIFIC REQUIREMENTS

AI ID: 18667 - CVD Inc - Advanced Materials
Activity Number: PER20070001
Permit Number: 1260-00023-08
Air - Minor (Synthetic) Initial

CRG0002 ZS1&3 Process Emission Control Scrubber (Zinc Products)

13 [LAC 33:III.501.C.6]

Permittee shall control emissions from the zinc-based production furnace primary packed column scrubbers with a secondary packed column scrubber.

- Hydrogen selenide / hydrogen sulfide concentration shall be monitored by hydride tapes once per shift during operation to access gas breakthrough in the scrubber fluid. The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly. The Hydride tapes lower detection limits (LDL) for hydrogen selenide (20 ppb) and hydrogen sulfide (1.1 ppm) shall be set conservatively at 2% and 50% of the corresponding emissions limits permitted here, and to match the industrial hygiene detection systems.

- A stained color on the tape indicates that the fluid is saturated and needs to be changed.

- This scrubbing fluid shall be changed the earlier of every 6 months or when the hydride tape indicates the fluid needs to be changed. Submit report: Due annually, by the 31st of March for the preceding calendar year, listing the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division.

14 [LAC 33:III.501.C.6]

CRG0003 EWRCS East & West Reactor Emission Control Scrubbers

Group Members: EQT0007 EQT0008

15 [LAC 33:III.501.C.6]

A greater than 10% KOH solution shall be maintained in the secondary scrubber with a scrubber liquid flow rate Flow rate \geq 75 gallons/min. Which Months: All Year Statistical Basis: None specified

16 [LAC 33:III.501.C.6]

Flow rate monitored by flow rate monitoring device once every shift during operation. Keep records of the scrubber flow rates on site and available for inspection by the Louisiana Department of Environmental Quality.

Which Months: All Year Statistical Basis: None specified

17 [LAC 33:III.501.C.6]

Flow rate recordkeeping by electronic or hard copy once every shift during operation.

18 [LAC 33:III.501.C.6]

Hydride tape indication. Equipment/operational data recordkeeping by electronic or hard copy once every shift during operation.

19 [LAC 33:III.501.C.6]

Keep records of the required fluid replacement on site and available for inspection by the Louisiana Department of Environmental Quality.

20 [LAC 33:III.501.C.6]

Keep records of the suppliers certification of percent concentration of purchased KOH, and the procedure used to obtain a scrubbing solution of greater than 10% by weight KOH, on site and available for inspection by the Louisiana Department of Environmental Quality. Liquids recordkeeping by the regulation's specified method(s) as needed.

SPECIFIC REQUIREMENTS

AI ID: 18667 - CVD Inc - Advanced Materials
Activity Number: PER20070001
Permit Number: 1260-00023-08
Air - Minor (Synthetic) Initial

CRG0003 EWRCS East & West Reactor Emission Control Scrubbers

21 [LAC 33:III.501.C.6] Permittee shall operate and maintain a packed column scrubber to control emissions from hydrogen selenide production.

- This scrubber shall be equipped with dual recirculator pumps.
- Hydrogen selenide / hydrogen sulfide concentration shall be monitored by hydride tapes once per shift during operation to access gas breakthrough in the scrubber fluid. The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly. The Hydride tape lower detection limit (LDL) for hydrogen selenide (20 ppb) is set conservatively at 2% of the corresponding emission limit permitted here, and to match the industrial hygiene detection systems.

- A stained color on the tape indicates that the fluid is saturated and needs to be changed.

- Scrubbing fluid shall be changed the earlier of every 120 to 130 hours of process operation or when the hydride tape indicates the fluid needs to be changed.

22 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year, listing the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division.

CRG0004 PECSSC Process Emission Control Scrubber Silicone Carbide

Group Members: EQT0009 EQT0010

23 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device once every shift during operation.

Which Months: All Year Statistical Basis: None specified

24 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every shift during operation. Keep records of the scrubber flow rates and required fluid replacement on site and available for inspection by the Louisiana Department of Environmental Quality.

25 [LAC 33:III.501.C.6] Mineral Acid tape indication. Equipment/operational data recordkeeping by electronic or hard copy once initially (upon initial start up and after reaching steady state) and also upon every start up after a malfunction.

26 [LAC 33:III.501.C.6] Permittee shall operate and run continuously a spray tower wet scrubber to control emissions from silicone carbide production.

- Hydrogen chloride concentration shall be monitored by mineral acid tapes once initially (upon initial start up and after reaching steady state) and also upon every start up after a malfunction during operation to access gas breakthrough in the scrubber fluid. The mineral tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly. The mineral acid tape lower detection limit (LDL) for hydrogen chloride (0.5 ppm) shall be set conservatively at 5% of the corresponding emission limit permitted here, and to match the industrial hygiene detection systems.

- A stained color on the tape indicates that the fluid is saturated and needs to be changed.

- Scrubbing fluid shall be changed when the mineral acid tape indicates the fluid needs to be changed.

27 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year, listing the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division.

SPECIFIC REQUIREMENTS

AI ID: 18667 - CVD Inc - Advanced Materials
Activity Number: PER20070001
Permit Number: 1260-00023-08
Air - Minor (Synthetic) Initial

CRG0004 PECSSC Process Emission Control Scrubber Silicone Carbide

28 [LAC 33:III.501.C.6] Water or a dilute NaOH solution shall be maintained in this scrubber with a scrubber solution Flow rate >= 6 gallons/min.
 Which Months: All Year Statistical Basis: None specified

CRG0005 GE Diesel Generators

Group Members: EQT0019 EQT0020

- 29 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
 Which Months: All Year Statistical Basis: None specified
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 30 [LAC 33:III.1311.C] Which Months: All Year Statistical Basis: Six-minute average
 Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
 Conduct a performance/emissions test, under idle conditions: Due within 180 days after issuance of the permit, or at load whenever such test is possible (the engine is taken off-line for an overhaul, or there is advanced notice of loss of power, or when a long power outage is expected).
 The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Repeat the test after each major engine overhaul.
 Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
 Equipment/operational data recordkeeping by electronic or hard copy semiannually. Recorded parameters are NOx, CO and O2 concentrations in the stack gas obtained during semiannual testing.
- 31 [LAC 33:III.1513.C] Stack gas concentration: Carbon monoxide monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days), under idle conditions only when the engine operates over 720 hours during any six-month-period and at load if this possible. Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
- 32 [LAC 33:III.501.C.6] Stack gas concentration: Nitrogen oxides monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days), under idle conditions only when the engine operates over 720 hours during any six-month-period and at load if this possible. Maintain concentrations of NOx in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
- 33 [LAC 33:III.501.C.6]
- 34 [LAC 33:III.501.C.6]
- 35 [LAC 33:III.501.C.6]

SPECIFIC REQUIREMENTS

AI ID: 18667 - CVD Inc - Advanced Materials
Activity Number: PER20070001
Permit Number: 1260-00023-08
Air - Minor (Synthetic) Initial

CRG0005 GE Diesel Generators

- 36 [LAC 33:III.501.C.6] Stack gas concentration: Oxygen monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days), under idle conditions only when the engine operates over 720 hours during any six-month-period and at load if this possible. Maintain concentrations of O2 in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
- 37 [LAC 33:III.501.C.6] Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 38 [LAC 33:III.501.C.6] Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment. The test results summary shall include any necessary conversion into the units of any applicable Standard. (lbs/MMBtu, gr/dscf, lbs SO2 / ton 100% H2SO4, Etc.) Plant and in house laboratory data to support production values shall be included. (Example: how many tons of 100% equivalent H2SO4 was being produced) Units tested at less than 95% of permitted maximum capacity shall provide documentation to support compliance at 100% of the permitted maximum capacity

EQI0005 06 Grinder Dust Collector

- 39 [LAC 33:III.501.C.6] Filter vents: Visible emissions monitored by visual inspection/determination daily. If visible emissions are observed, restore operation of the filter to its normal or usual manner of operation as expeditiously as practicable, but at a minimum within three working days, in accordance with good air pollution control practices for minimizing emissions.
 Which Months: All Year Statistical Basis: None specified
- 40 [LAC 33:III.501.C.6] Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.
- 41 [LAC 33:III.501.C.6] Particulate matter (10 microns or less) >= 85 % removal efficiency from filter manufacturer's certification.
 Which Months: All Year Statistical Basis: None specified

EQI0006 07 Gas House Scrubber

- 42 [LAC 33:III.501.C.6] A greater than 10% KOH solution shall be maintained in the secondary scrubber with a scrubber liquid Flow rate >= 15 gallons/min.
 Which Months: All Year Statistical Basis: None specified
- 43 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device once every shift during operation.
 Which Months: All Year Statistical Basis: None specified
- 44 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every shift during operation.
- 45 [LAC 33:III.501.C.6] Hydride tape indication. Equipment/operational data recordkeeping by electronic or hard copy once every shift during operation.
- 46 [LAC 33:III.501.C.6] Keep records of the required fluid replacement on site and available for inspection by the Louisiana Department of Environmental Quality.
- 47 [LAC 33:III.501.C.6] Keep records of the suppliers certification of percent concentration of purchased KOH, and the procedure used to obtain a scrubbing solution of greater than 10% by weight KOH, on site and available for inspection by the Louisiana Department of Environmental Quality. Liquids recordkeeping by the regulation's specified method(s) as needed.

SPECIFIC REQUIREMENTS

AI ID: 18667 - CVD Inc - Advanced Materials
Activity Number: PER20070001
Permit Number: 1260-00023-08
Air - Minor (Synthetic) Initial

EQT0006 07 Gas House Scrubber

48 [LAC 33:III.501.C.6]

Permittee shall operate, maintain and run continuously a packed column scrubber to control emissions from the Hydrogen Selenide Storage Area and process line purge area

- Hydrogen selenide / hydrogen sulfide concentration shall be monitored by hydride tapes once per shift during operation to access gas breakthrough in the scrubber fluid. The hydride tape, a colorimetric indicator, shall be used here to detect leak in the manufacturing room prior to entering the inlet of the scrubber. The Hydride tapes lower detection limits (LDL) for hydrogen selenide (20 ppb) and hydrogen sulfide (1.1 ppm) are set conservatively at 2% and 50% of the corresponding emissions limits permitted here, and to match the industrial hygiene detection systems.

- A stained color on the tape indicates that the fluid is saturated and needs to be changed.

- This scrubbing fluid shall be changed the earlier of every 6 months or when the hydride tape indicates the fluid needs to be changed. Submit report: Due annually, by the 31st of March for the preceding calendar year, listing the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division.

49 [LAC 33:III.501.C.6]

EQT0012 34 Gas Plant Room Air Scrubber

50 [LAC 33:III.501.C.6]

A greater than 10% KOH solution shall be maintained in the secondary scrubber with a scrubber liquid Flow rate \geq 90 gallons/min. Which Months: All Year Statistical Basis: None specified

51 [LAC 33:III.501.C.6]

Flow rate monitored by flow rate monitoring device once every shift during operation.

52 [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

53 [LAC 33:III.501.C.6]

Flow rate recordkeeping by electronic or hard copy once every shift during operation.

54 [LAC 33:III.501.C.6]

Hydride tape indication. Equipment/operational data recordkeeping by electronic or hard copy once every shift during operation.

Keep records of the scrubber required fluid replacement on site and available for inspection by the Louisiana Department of Environmental Quality.

55 [LAC 33:III.501.C.6]

Keep records of the suppliers certification of percent concentration of purchased KOH, and the procedure used to obtain a scrubbing solution of greater than 10% by weight KOH, shall be kept on site and available for inspection by the Louisiana Department of Environmental Quality

56 [LAC 33:III.501.C.6]

Liquids recordkeeping by the regulation's specified method(s) as needed. List the hours that the scrubber operated out of the ranges specified. Submit report: Due annually, by the 31st of March for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

SPECIFIC REQUIREMENTS

AI ID: 18667 - CVD Inc - Advanced Materials

Activity Number: PER20070001

Permit Number: 1260-00023-08

Air - Minor (Synthetic) Initial

EQT0012 34 Gas Plant Room Air Scrubber.

57 [LAC 33:III.501.C.6]

Permittee shall operate, maintain and run continuously a packed column scrubber to control emissions from the Hydrogen Selenide Storage Area and process line purge area.

- Hydrogen selenide / hydrogen sulfide concentration monitored by hydride tapes once per shift during operation to access gas breakthrough in the scrubber fluid. The hydride tape, a colorimetric indicator, is used here to detect leak in the manufacturing room prior to entering the inlet of the scrubber. The Hydride tapes lower detection limits (LDL) for hydrogen selenide (20 ppb) and hydrogen sulfide (1.1 ppm) are set conservatively at 2% and 50% of the corresponding emissions limits permitted here, and to match the industrial hygiene detection systems.

- A stained color on the tape indicates that the fluid is saturated and needs to be changed.

- This scrubbing fluid shall be changed the earlier of every 6 months or when the hydride tape indicates the fluid needs to be changed.

EQT0022 37 Fabrication Vacuum System

58 [LAC 33:III.501.C.6]

Filter vents: Visible emissions monitored by visual inspection/determination daily. If visible emissions are observed, restore operation of the filter to its normal or usual manner of operation as expeditiously as practicable, but at a minimum within three working days, in accordance with good air pollution control practices for minimizing emissions.

Which Months: All Year Statistical Basis: None specified

59 [LAC 33:III.501.C.6]

Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

60 [LAC 33:III.501.C.6]

Particulate matter (10 microns or less) >= 90 % removal efficiency from filter manufacturer's certification.

Which Months: All Year Statistical Basis: None specified

FUG0002 14 Xylene Fugitive Emissions

61 [LAC 33:III.501.C.6]

Xylene Throughput <= 130 gallons/yr. Notify the Office of Environmental Compliance, Enforcement Division if the Xylene throughput exceeds the maximum listed in this specific condition for any twelve consecutive month period.

Which Months: All Year Phases: Statistical Basis:

62 [LAC 33:III.501.C.6]

Xylene Throughput recordkeeping by electronic or hard copy upon occurrence of event. Keep records of the total xylene used each month, as well as the total Xylene usage for the last twelve months.

GRP0001 33 Spray Booth Emission Cap

Group Members: EQT0003 EQT0004

63 [LAC 33:III.501.C.6]

Driglide (Driglide is 90% Isopropanol and 10 % Graphite) Throughput recordkeeping by electronic or hard copy once per batch during operation. Throughput recordkeeping by electronic or hard copy monthly. Keep records of the total Driglide loaded each month, as well as the total loaded for the last twelve months.

64 [LAC 33:III.501.C.6]

Driglide (Driglide is 90% Isopropanol and 10% graphite) Throughput <= 675 gallons/yr. Notify the Office of Environmental Compliance, Enforcement Division if throughput exceeds the maximum listed in this specific condition for any twelve consecutive month period.

Which Months: All Year Phases: Statistical Basis:

SPECIFIC REQUIREMENTS

AI ID: 18667 - CVD Inc - Advanced Materials
Activity Number: PER20070001
Permit Number: 1260-00023-08
Air - Minor (Synthetic) Initial

GRP0003 36 Generators Emissions CAP

Group Members: EQT0019 EQT0020

- 65 [LAC 33:III.501.C.6] Operating time monitored by technically sound method monthly. Which Months: All Year Statistical Basis: None specified
- 66 [LAC 33:III.501.C.6] Operating time recordkeeping by electronic or hard copy monthly. Keep records of the combined total of operating time for both generators, Emission Point 24 and 31, for the last twelve months. Make records available for inspection by DEQ personnel. Submit report: Due annually, by the 31st of March. Report the combined total of operating time for both generators, Emission Point 24 and 31 for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
- 67 [LAC 33:III.501.C.6] The combined annual total Operating time <= 2430 hr/yr for both generators, Emission Points 024 and 31. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the combined annual total operating time for both generators exceeds the maximum listed in this specific condition for any twelve consecutive month period. Which Months: All Year Statistical Basis: None specified

UNF0001 Weeks Island Advanced Materials

- 69 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.1111 or intensify an existing traffic hazard condition are prohibited.
- 70 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 71 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 72 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 73 [LAC 33:III.2119] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 74 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 75 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 76 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Rohm & Haas Chemicals LLC	AI #:	18667	TEMPO Activity No:	PER20070001
Facility Name:	CVD Inc – Advanced Materials	Remarks Submitted by:	Jeremy Weese / Karen Jenkins		
Permit Writer:	Hassan Ghosn	Permit Writer Email address:	Hassan.ghosn@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”; or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – **DO NOT COMPLETE THIS SECTION.** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
<p>III. Description</p>	<p>Request to incorporate the following corrections. The fourth Zinc furnace started operations on January 5, 2007. The second silicon carbide furnace started operations on December 17, 2007</p> <p>“The facility has three four chemical vapor deposition (CVD) vacuum furnaces dedicated to the production of optical materials consisting of zinc selenide, or zinc sulfide, and one two furnace for silicon carbide.”</p>	<p>The change is made in accordance with the new supplied information.</p>
<p>III. Description</p>	<p>Request to delete the following sentence, already in operation. (See previous comment)</p> <p>“An additional silicon carbide unit will be built as the facility expansion associated with the previous permit modification.”</p>	<p>The whole sentence is removed consistent with the new supplied information.</p>

Remarks

Permit Reference

Request to remove the listing of MTS as a previously permitted TAP in the table of changes. MTS is not a listed HAP in Chapter 51 of the Louisiana Regulations. In addition, MTS emissions will still be emitted from the facility as permitted VOC emissions (as in current operations). Hence Total "Before" TAPS would be 9,232 tpy, not 10,692; and the delta should be 7,849.

III. Description

Request to remove the following sentence, or re-word to state "not subject to".

"The facility may be subject to the requirements of 40 CFR 63 - Subpart SSSSS "National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources" promulgated December 26, 2007."

Per discussions in January of 2008 between interested parties (R&H and LDEQ), this facility, DOES NOT manufacture flat glass, glass containers, or pressed and blown glass by melting a mixture of raw materials, as defined in §63.11459, to produce molten glass and form the molten glass into sheets, containers, or other shapes. Hence, the facility does not meet the criteria specified in 40 CFR 63.11448, and is not subject to this regulation.

Please note that the SIC code for this facility is 3827 (Optical Instruments and Lenses). This SIC Code consists of establishments primarily engaged in manufacturing instruments and apparatus that measure an optical property and optically project, measure, or magnify an image, such as binoculars, microscopes, prisms, and lenses.

However, the facility has been required to use the SIC Code of 3229 (Pressed and Blown Glass and Glassware, Not Elsewhere Classified) for determining fees in accordance with LAC 33:III.211.B.6 (Fee Negotiation) which was established by the LDEQ more than 6 years ago. This SIC code is for establishments primarily engaged in manufacturing glass and glassware, not elsewhere classified, pressed, blown, or shaped from glass produced in the same establishment. At this time, there is still no fees established in Chapter 2 of LAC 33:III for this facility's appropriate SIC Code (which is 3827).

IV. Type of Review

Noted and corrected as appropriate.

The paragraph in question has been modified to read as follows:
"The facility does not manufacture flat glass; glass containers, or pressed and blown glass by melting a mixture of raw materials, as defined in 40 CFR 63.11459. Hence the facility it does not meet the applicability criteria specified in 40 CFR 63.11448 and thus it is not subject to the requirements of 40 CFR 63 - Subpart SSSSS "National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources" promulgated December 26, 2007."

Permit Reference	Remarks	Air Permits Division Response (for official use only)
VIII. Insignificant Activities	Request to remove AM-Chem Tank 1 and AM-Chem Tank 2, these insignificant activities were associated with the cooling tower which is no longer at the facility.	The request is granted and the tanks should be removed out of service or should be taken off -site.
Inventories	EQT002 (EP 01), request to update the Max. Operating Rate to 1280 ft ³ /min (actual), and the Normal Operating Rate to 640 ft ³ /min (actual) to match the emissions calculations basis submitted with the permit application. This change will also make fit match the similar source EQT018 (EP 35).	The reported number was taken from the calculation sheet for the corresponding emission point that accompanied the application. However, the change is granted in accordance with the new submitted calculation sheets.
Inventories	Request that the Operating Time for EQT0005 (EP 06) be corrected from 1000 hr/yr to 8760 hr/yr to match the emissions calculations basis submitted with the permit application.	The request is granted.
Inventories	EQT007 (EP 08), request the Max. Operating Rate to be listed as 920 ft ³ /min (actual), to match the identical unit (EQT0008 (EP 09), and the emissions calculations basis submitted with the permit application.	The reported number was taken from the calculation sheet for the corresponding emission point that accompanied the application. However, the change is granted in accordance with the new submitted calculation sheets.
Inventories	EQT0013 (01-A), EQT0014 (01-B), EQT0015 (01-C), EQT0016 (35-A), EQT0017 (35-B) Primary Scrubbers - Request to delete the Max. Operating Rate (or list Not applicable), and list the Normal Operating Rate as ≥ 15 gallons/min. Otherwise the facility will always be out of compliance with the maximum operating rate or the specific requirements (how ever one wants to look at it).	The scrubbers flow rates are listed in the corresponding specific requirements. The normal and maximum operating rates of the scrubbers in the corresponding subject item fields are left blank because the information provided can not be input in the available fields. Consequently, Not Applicable will appear on the Inventories document.
Inventories	Request to correct the units on the Normal Operating Rate for EQT0020 (EP 24) from "2518 Not applicable" to 2518 horsepower".	The request is granted.
Inventories	Request that the Operating Time for EQT0022 (EP 37) be corrected from 1000 hr/yr to 8760 hr/yr to match the emissions calculations basis submitted with the permit application.	The request is granted.
Inventories	Request the units on the maximum of 130 lb/hr for FUG002 (EP 14) be corrected to "gallons/yr" to match the calculation basis submitted with the permit application. (this will make it match Specific Requirement # 62)	The request is granted.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
<p>CRG0001 - PS3-8 CVD Primary Scrubbers Nos. 3 through 8 - These primary scrubbers are directly connected to their respective furnace for the inlet, and the outlets are directly connected to the inlet of the Secondary scrubbers. Facility will open a valved port in the line from the Primary to the Secondary Scrubber to introduce the hydride tape to the process stream. Request to remove the following sentence.</p> <p>"The hydride tape, a colorimetric indicator, shall be used to detect leak in the manufacturing room prior to entering the inlet of the scrubber."</p> <p><i>Note, the above statement only applies to EQT006 (EP 07) and EQT0012 (EP 34).</i></p> <p>Specific Requirements</p>	<p>Consistent with the operating condition (s), the sentence in question will be modified to read as follows:</p> <p>"The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly."</p>	<p>Consistent with the operating condition (s), the sentence in question will be modified to read as follows:</p> <p>"The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly."</p>
<p>CRG0002 - ZSI&3 Process Emission Control Scrubber (Zinc Products) - The inlet of these scrubbers are connected directly to the process. The tape used for detection for the scrubbers in CRG0001 will indicate if there is any Hydrogen Selenide going into the Secondary scrubbers. Request to remove the following sentence.</p> <p>"The hydride tape, a colorimetric indicator, shall be used here to detect leak in the manufacturing room prior to entering the inlet of the scrubber."</p> <p><i>Note, the above statement only applies to EQT006 (EP 07) and EQT0012 (EP 34).</i></p> <p>Specific Requirements</p>	<p>Consistent with the operating condition (s), the sentence in question will be modified to read as follows:</p> <p>"The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly."</p>	<p>Consistent with the operating condition (s), the sentence in question will be modified to read as follows:</p> <p>"The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly."</p>
<p>CRG0003 - EWRCS East & West Reactor Emission Control Scrubbers - The inlet of these scrubbers are connected directly to the process. A piece of Hydride tape will be lifted on a pole to the outlet of the scrubber (scrubber stack) to introduce the tape to the process stream. Request to remove the following sentence.</p> <p>"The hydride tape, a colorimetric indicator, shall be used here to detect leak in the manufacturing room prior to entering the inlet of the scrubber."</p> <p><i>Note, the above statement only applies to EQT006 (EP 07) and EQT0012 (EP 34).</i></p> <p>Specific Requirements</p>	<p>Consistent with the operating condition (s), the sentence in question will be modified to read as follows:</p> <p>"The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly."</p>	<p>Consistent with the operating condition (s), the sentence in question will be modified to read as follows:</p> <p>"The Hydride tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly."</p>

Air Permits Division Response (for official use only)

Permit Reference	Remarks	Air Permits Division Response (for official use only)
<p>Specific Requirements</p> <p>CRG0004 - PECSSC Process Emission Control Scrubber Silicon Carbide - Request to remove Specific Requirement # 25. This requirement is already included in Specific Requirement # 24.</p>	<p>CRG0004 - PECSSC Process Emission Control Scrubber Silicon Carbide - Request to Change specific requirement number 26 to the following:</p> <p>"Mineral Acid tape indication. Equipment/operational data recordkeeping by electronic or hard copy once every shift during operation when system is starting-up (after steady-state) and in the event of a malfunction during operation."</p> <p>Request to remove the "once per shift" requirement because of the following reasons: The process that these scrubbers service is a continuous process. The scrubbing fluid is a once through system (i.e., it is not recirculated), so the presence of the required flow indicates proper operation of the scrubber. The requirement to test these scrubbers each shift with mineral acid tape would be an operational and recordkeeping redundancy.</p>	<p>The request is granted.</p> <p>Consistent with the operating condition (s), the sentence in question will be modified to read as follows:</p> <p>"Mineral Acid tape indication. Equipment/operational data recordkeeping by electronic or hard copy once initially (upon initial start-up and after reaching steady state) and also upon every start-up after a malfunction."</p>
<p>Specific Requirements</p>	<p>CRG0004 - PECSSC Process Emission Control Scrubber Silicon Carbide - The inlet of these scrubbers are connected directly to the process. A piece of Mineral Acid tape will be lifted on a pole to the outlet of the scrubber (scrubber stack) to introduce the tape to the process stream. Request to remove the following sentence.</p> <p>"The mineral acid tape, a colorimetric indicator, shall be used here to detect leaks in the manufacturing room prior to entering the inlet of the scrubber."</p> <p><i>Note, the above statement only applies to EQT006 (EP 07) and EQT0012 (EP 34).</i></p>	<p>Consistent with the operating condition (s), the sentence in question will be modified to read as follows:</p> <p>"The mineral tape, a calorimetric indicator, shall be used to verify that the scrubber is operating properly."</p>
<p>Specific Requirements</p>	<p>GRP0001 - Spray Booth Emission Cap - Request that Specific Requirement # 65 be corrected from Throughput <= 600 gallons/yr to Throughput <= 675 gallons/yr to match the emissions calculations basis submitted with the permit application.</p>	<p>The request is granted.</p>